REMEDIAL SITE ASSESSMENT DECISION EPA - REGION 5

SITE NAME: Cliffs Containers **EPA ID#** ILD000768481

ALIAS SITE NAME(S):

CITY: **COUNTY:** **STATE:** IL

REPORT DATED: 11/2000 **REPORT TYPE:** Memo

REPORT PREPARER: EPA - SF/RCRA **SITE TYPE:** ____ GAO X IG

DISCUSSION/RATIONALE: "Lead Confirmed" - Site deferral to RCRA is correct.

Special Initiative Flag entered.

See attached.

Report Reviewed/
Site Decision Made by: J Griffin **Date:** 11/15/00

Region 5 Revision of EPA Form # 9100-3,11/00 – Special - IG Audit

RESOURCE CONSERVATION AND RECOVERY ACT HANDLERS ASSESSMENT

For:

CLIFFS CONTAINER
ROMEOVILLE, ILLINOIS

PREPARED BY:
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF LAND
FEDERAL SITES REMEDIATION SECTION
SITE ASSESSMENT UNIT

SEPTEMBER 2000

1.0 SITE BACKGROUND

Introduction

On June 29th, 1999 the Illinois Environmental Protection Agency's (Illinois EPA) Site Assessment Program was tasked by the Region 5 offices of the United States Environmental Protection Agency (U.S.EPA) to undertake an initial assessment of a number of Resource Conservation and Recovery Act (RCRA) facilities within the State. These facilities are presently contained within the RCRA database but are not subject to RCRA's corrective action authorities and are currently referred to as RCRA "handlers". This RCRA Handlers Assessment Report is designed to identify facilities, which may pose a threat to human health or the environment, and to determine if placement of these facilities onto the Comprehensive Environmental Response, Compensation, and Liability Inventory System (CERCLIS) is warranted.

Site Description and History

The initial phase of this RCRA handlers review prior to visiting the facility, consisted of conducting a review of all Illinois EPA Bureau of Land files for the Cliffs Container facility located at 525 E. 135th St. in the Village of Romeoville, Illinois. It was found that the Cliffs Container facility was a drum restoration business, operating from the early 1970's to the early 1990's, providing drum recycling to off-site customers. During the time period of the early 1970's to the early 1980's, the owner indicated that he picked up empty 55-gallon steel, polyethylene, and fiber drums from customers, transported them to his facility, washed the steel and poly drums with a caustic solution in a wash bath, rinsed them and then would sell them to off-site customers. Residual dry material in the fiber drums was removed onto the floor and rinsed down the drain and into a wastewater holding area. This

holding area also received rinse water from the drum wash process. Some of the empty steel and poly drums contained residual amounts of their former contents. If these drums formerly contained an ignitable product the residual material was combined with diesel fuel and burned in the furnace that heated the facility building. Hazardous wastes generated or managed at the facility in the 1970's until the early 1980's included ignitable material, spent caustic solution and rinse water. After the early 1980's, the facility stopped washing and rinsing drums. Since that time drums were only bought, transported and sold. The majority of these formerly contained food products, such as molasses, vinegar, and fruit juices. No drums have been washed since the early 1980's.

This business is no longer in operation, having gone out of business in 1997.

The facility is located on a small island, approximately four acres in size, in the Des Plaines River, within the Village of Romeoville. The facility occupies approximately one and one half acres on the island. The area surrounding the facility is primarily light industrial in the east-central portion of the village.

On September 19, 2000, personnel of the Illinois EPA Site Assessment Unit inspected the Cliffs Container facility. The inspection consisted of talking with the owner, conducting an escorted walk through of the facility and identifying five solid waste management units (SWMU's). The building is approximately sixty-five feet across the front, east to west, including a recessed loading dock at the west end, and approximately fifty feet front to back (north to south). The building is set back from 135th St. approximately forty feet to the south. Drums brought to the facility were either off loaded at the loading dock in the building or outside and stored in areas

referred to as front drum storage area (SWMU 1) or rear drum storage area (SWMU 2). Once drums were brought inside the building they were cleaned in a 135 cubic foot open top steel tank (SWMU 5) formerly containing a caustic wash solution. This tank is located approximately in the central-east portion of the building on a concrete floor adjacent to a floor drain. Just west of the wash tank is the buildings' furnace (SWMU 4). The floor drain, mentioned, received rinse water from the former operations and a one-time discharge of the caustic solution when drum washing ceased in the early 1980's. The floor drain flowed to a wastewater holding unit (SWMU 3) located south of the building. This unit originally consisted of an unlined pit about two hundred fifty cubic feet in size and an unlined trench which discharged to the Des Plaines River. In 1980, two inter-connected five hundred-gallon steel under ground storage tanks (USTs) were installed in the pit to receive rinse water. Discharge continued to be to the Des Plaines River but was via a pipe instead of a trench. All SWMUs remain at the facility, although none are active. SWMU 3 may still be discharging to the river. Observations of the outdoor property included noting that two trucks containing drums were located in the southeast portion of the site parked approximately twenty feet from the river. One contained fiber drums, the other contained steel drums labeled flammable and acetone. All drums appeared empty. Approximately twenty other drums were noted to remain in both, the front and rear drum storage areas. The site appears to have had three feet of fill material and gravel road pack applied to the east and west rear portions of the property. Both areas formerly had trenches leading to the Des Plaines River. There were no stains or evidence of a previous release at any location on site. Miscellaneous equipment

and debris was strewn about the interior of the building while the majority of the outdoor items were at the east rear, including an old pick-up truck with a camper top, an old tractor, small motors and other scrap items.

Pathway Analysis

The Village of Romeoville obtains drinking water from nine municipal wells ranging in depth from 150 to 1500 feet. Six draw water from the shallow bedrock aquifer (dolomite) and three draw from the deep bedrock aquifer (dolomite and sandstone). The nearest public well is located approximately one and nine tenths miles northwest of the facility. In the vicinity of the facility there are very thin glacial outwash deposits over bedrock. Natural surficial deposits are approximately two feet thick. Shallow bedrock in the vicinity of the facility is Silurian dolomite, which is approximately two hundred fifty feet thick. This aquifer is likely to be saturated up to the elevation of the Des Plaines River, which is a local discharge zone. Underlying the dolomite is Maquoketa Shale which serves as a confining layer between the shallow and deep aquifer. Beneath the shale, the deep aquifer consists of Ordovician and Cambrian dolomites and sandstones. Groundwater at the facility is encountered at approximately five feet below ground surface (bgs). A well on-site draws water from about eighty feet bgs. There is also a well in the forest preserve area approximately two hundred feet west of the facility, used frequently for drinking water. Area residents located outside the Romeoville municipal water system are supplied by private wells drawing from the shallow bedrock aquifer. The nearest private well is located about one half-mile west of the facility. The potential for contamination entering the drinking water supply would appear to be high.

The nearest perennial surface water body is the Des Plaines River, which is located immediately adjacent to the east and west property lines of the facility. This review suggests that there has been and still are direct overland flow paths from the site to this surface water body. Sampling of water in the wastewater holding area in 1984 indicated a pH of 12.8 with elevated levels of, among others, lead, zinc, and chrome.

Considering the time period of its operation, the fact that the majority of the site is gravel covered, the facility's minimal containment practices throughout its operational history, and the fact that the facility is accessible to the public; the possibility of contamination leaving the site and entering the surrounding environs appears to be high.

The owner of the facility did not conduct waste analysis or keep records of volume of waste generated or managed. The facility is currently regulated as a non-handler of hazardous waste

Conclusions and Recommendations

This reviewer recommends that regulation of this facility by the federal RCRA program be discontinued. However, due to the potential for contaminant migration off-site it is further recommended that the facility be entered in the Comprehensive Environmental Response Compensation and Liability Act's Information System database for future additional CERCLA investigative activities. This assessment has also determined that any environmental concerns at this facility may be of such a magnitude to warrant CERCLA Removal or Remedial attention at this time.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

September 25, 2000

Ms. Jeanne Griffin
Emergency Response Branch
Region V Offices
Office of Superfund
U.S. Environmental Protection Agency
77 West Jackson
Chicago, Illinois 60604

Dear Ms. Griffin:

Please find enclosed a copy of the Resource Conservation and Recovery Act Handlers Assessment Report and site recommendation for the following sites slated for completion in our Fiscal 2000 Site Assessment cooperative agreement.

SITE NAME	COUNTY	CERCLA RECOMMENDATION
Electronic Support Systems	Cook	No
Cliffs Container 000768481	Cook	Yes
Amsted Industries 010278281	Cook	No
Climate Control Inc. 982419335	Macon	Yes
Cellofilm Corporation 074432303	Cook	No
Commonwealth Edison 000665489	Grundy	No
Commonwealth Edison 000806521	Ogle	No
Elkwood Plating 005126131	Cook	No
Anchor Glass Container 980589733	LaSalle	No
Benston Industries	Kane	Yes

We are pleased to provide you with the attached report. Should you have any questions or comments concerning this submission please feel free to contact me, or the authors of the specific report.

Sincerely,

Thomas Crause
Manager, Site Assessment Programs
Division of Remediation Management
Illinois Environmental Protection Agency

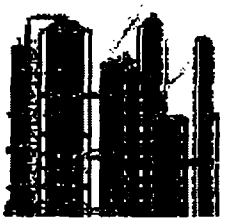
Superfund Site Assessment Data Management

EPA - Office of Emergency and Remedial Response

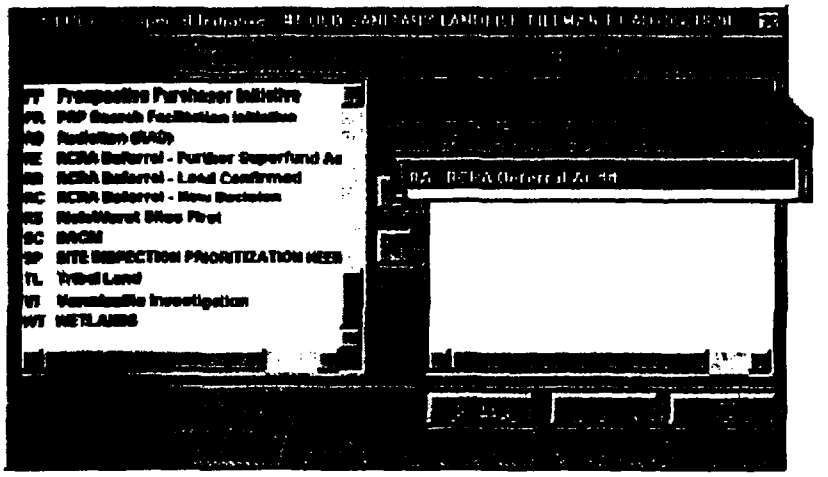
Reporting RCRA Deferral Activities

July 2000

What are RCRA Deferral Sites?



A March 1999 report by EPA's Office of the Inspector General (OIG) identified 2,941 Superfund sites that have been deferred to the Resource Conservation and Recovery Act (RCRA) program. The OIG report determined that 842 sites are being appropriately addressed under RCRA, and 2,099 need further attention.



EPA has developed two measures to track and evaluate these 2,099 sites in WasteLAN. First, EPA Headquarters will flag the sites using the existing "RCRA Deferral Audit" Special Initiative, and Regions will be able to enter one of the following three new Special Initiatives : RCRA Deferral—Lead Confirmed; RCRA Deferral—New Decision; or RCRA Deferral—Further Assessment. The second measure adds a new WasteLAN action, "Site Reassessment", that will track reassessment activities at sites.

How Will Tracking RCRA Deferral Sites Benefit EPA?

Use of the one existing and three new Special Initiatives and the new WasteLAN action, "Site Reassessment," will allow EPA to:

- Readily identify the OIG RCRA deferral sites and accurately report their current status;
- Effectively track reassessment activities, recording dates and fiscal year accomplishments; and
- Receive proper credit for reassessment work performed in the Regions.

Additionally, these new initiatives allow the Regions to track the status of RCRA deferral sites that were identified in the 2,099 sites needing further attention. The new "Site Reassessment" action does not replace current assessment actions; it serves as a supplement in instances when some assessment is needed to evaluate new information on a site, yet a full assessment action is not warranted under the Superfund program.

How Will Regional Staff Maintain RCRA Deferral Activities?

Regions will be responsible for entering the new WasteLAN Special Initiatives. The new Regional Special Initiatives are:

- RCRA Deferral—Lead Confirmed: Indicates that the RCRA-Deferral decision was accurate; i.e., there is no change to the current RCRA deferral status.
- RCRA Deferral—New Decision: Indicates that EPA is correcting or changing the currently-listed decision from "Deferred to RCRA" to another indicator.
- RCRA Deferral—Further Superfund Assessment: Indicates that EPA needs to conduct further assessment to update the status. (This initiative should be used in conjunction with the new Site Reassessment action.)

Regions will also be responsible for recording Site Reassessment activities using the new WasteLAN action.

Who Can I Contact for More Information?

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: November 20, 2000

SUBJECT: Lead Confirmation for Sites Identified in the FY'1999 OIG Audit of Sites Deferred to RCRA

FROM: Joseph Duffic
Brownfield/Early Action Section
Superfund Division

Gerald Phillips
Corrective Action Manager
Waste, Pesticides & Toxics Division

TO: SITE FILES

This memo is to memorialize the lead decisions for those sites that the Office of the Inspector General (OIG) identified in the March 1999 report, entitled "Superfund Sites Deferred to RCRA." The OIG audit recommended that Superfund reevaluate all deferred sites not in the RCRA corrective action workload to determine the best legal authority to address the sites, and any response actions necessary in order to improve communication between the programs. The OIG also recommended that the two programs should reach agreement on which program will take lead responsibility for each of the sites by the end of calendar year 2000.

The OIG lists for Region 5 included (493 sites) 'Sites Subject to Corrective Action', and (184 sites) 'RCRA Handlers' that may not be subject to corrective action. These two lists (attached) have been reviewed by both programs and are identified with one of the three Special Initiative flags. For those sites that have been scored under the RCRA NCAPS model, they are noted as RCRA Deferral - Lead Confirmed. For those sites to be addressed under Superfund, they are identified on the attached lists as RCRA Deferral - New Decision or RCRA Deferral - Further Assessment. All sites requiring reassessments by Superfund will have findings provided to RCRA for their information.

Attachments (2) *

cc: State Site Assessment Contacts
EAPMs

* FOR ATTACHMENTS PLEASE REFER to the following two SITE FILES:
AKZO COATINGS INC. ILD006390553
AG COMMUNICATION SYS. ILD005070545